

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

JULIA M. LAWRENCE,

Defendant.

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Case No. 19-03103-01-CR-S-SRB

MOTION FOR CONTINUANCE

COMES NOW Defendant by and through her attorney and hereby respectfully requests a continuance from the March 16, 2020 trial docket.

SUPPORTING SUGGESTIONS

1. Defendant is charged with possessing 50 grams or more of methamphetamine with the intent to distribute on May 29, 2019.
2. The indictment was filed on August 20, 2019 and carries a mandatory minimum sentence of five years.
3. A primary defense in this case relates to the protection of defendant's Fourth Amendment rights regarding a warrantless, nonconsensual search of the defendant's vehicle which was occupied by the defendant and another person.
4. The arrest of the defendant and the search of her vehicle was conducted by Springfield Police Officers.
5. There are police reports and other documents that are extremely vital to the protection of the defendant's constitutional rights under the Fourth Amendment rights are still not a part of the defendant's discovery file and counsel, as a result, is unable to prepare and properly construct the necessary motion to effectively defend his client.

6. The Federal prosecutor has been made aware of the defendant's problem and has genuinely attempted to secure the missing documents and police reports. Indeed, some of the needed documents have been secured in the last few days.
7. Defendant's due process and Fourth Amendment rights will be unprotected if the case is required to be tried on the March 16 trial docket.
8. Counsel fully believes that this extension of time will allow for the government to secure all of the necessary documents from the investigative files and thereby protect the defendant's rights to effectively defend herself. A Speedy Trial Waiver is on file and Defendant supports its use.
9. Counsel, as a long time officer of this Honorable Court, truly believes that valid challenges to apparent Fourth Amendment violations exist and that mandating trial under the March trial docket time constraints will prevent a full and fair defense by this defendant.

WHEREFORE, in the true interest of justice, Defendant respectfully asks the Court to sustain this Motion.

/s/Donald R. Cooley
Donald R. Cooley
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CERTIFICATE OF SERVICE

I hereby certify that the filing of this Motion on the CM/ECF computer system, which also delivers copies of the same to all counsel of record, was performed on this 21st day of February, 2020.

/s/Donald R. Cooley
Donald R. Cooley